

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re:	§	Case No. 12-41837
	§	Chapter 7
JENNIFER L. RYAN,	§	
	§	Hearing:
Debtor.	§	November 13, 2012 at 1:30 p.m.

DEBTOR'S OBJECTION TO
U.S. TRUSTEE'S MOTION TO DISMISS

Jennifer L. Ryan ("Debtor") files this Debtor's Objection to U.S. Trustee's Motion to Dismiss and respectfully states as follows:

1. The Debtor's estimations of anticipated postpetition income and expenses set forth in the Debtor's Schedules [Docket 8] (and the amendments thereto dated September 5, 2012 [Docket No. 13]) were based upon the Debtor's six-month historical income and expenses (January 3, 2012 through July 3, 2012), since it is presumed that historical income/expenses are the best indicators of future income and expenses.

2. As is often the case with future predictions, actual results can differ. Contemporaneously herewith, the Debtor has filed her Amended Schedules I & J and the estimations of future income and expenses based upon the Debtor's actual postpetition income and expenses for the period of July 3, 2012 through October 31, 2012, together with the Debtor's current expectations for her future.

3. It has become clear to the Debtor that she can no longer afford her homestead. She intends to abandon the same and move to an apartment.

4. The Debtor's monthly income has dropped to approximately \$4,000.

5. Based upon the Debtor's current income and expenses, the Motion should be denied.

WHEREFORE, the Debtor respectfully requests the Court to deny the Motion and to grant such relief to the Debtor as may be appropriate.

Date: November 8, 2012

Respectfully Submitted,

RICHARD G. GRANT, P.C.

By: /s/ Richard G. Grant
Richard G. Grant
Texas Bar No. 08302650

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COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing pleading was served pursuant to the Court's electronic filing system on November 8, 2012

/s/ Richard G. Grant
Richard G. Grant